

February 7, 2025

Honorable Joan M. Azrack
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Cortez v. United States*, No. 2:24-CV-7532 (JMA/ARL)

Dear Judge Azrack:

The above-reference putative class action under the Little Tucker Act, 28 U.S.C. § 1346(a)(2), was filed on October 29, 2024. On February 3, 2025, the Government filed a letter seeking a premotion conference as to its intended motion to dismiss the Complaint for lack of subject matter jurisdiction under Rule 12(b)(1). ECF No. 17.

Under the Court's Individual Practice Rules, Plaintiff Douglas Cortez's responsive premotion letter would be due this coming Monday, February 10. Plaintiff's legal team needs a few extra days to confer and finalize our response to the Government's letter. We therefore respectfully seek an extension until Friday, February 14, 2025, to file Plaintiff's responsive premotion letter.

We have conferred with counsel for the Government and have been authorized by them to represent to the Court that the Government does not oppose this requested extension of time. We appreciate the Court's time and attention to this matter.

Respectfully submitted,



F. Franklin Amanat
Motley Rice LLC

Counsel for Plaintiff



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cc (by ECF notification and courtesy email):
AUSA Robert W. Schumacher, II
All counsel of record